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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BLAKE WAYNE REED,

Defendant.

CASE NO: 1:23-CR-00101-ADA-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE AND REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT; ORDER

DATE: October 11, 2023
TIME: 1:00 p.m.
COURT: Hon. Barbara A. McAuliffe

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Erin Snider, counsel for Blake Wayne Reed (“defendant”), that this action’s **Wednesday, October 11, 2023, status conference be continued to Wednesday, December 13, 2023, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. The grand jury returned an indictment regarding this matter on May 25, 2023. Dkt. 1. Since that time, the parties agreed to and presented to the court a stipulation and proposed protective order regarding the production of third parties’ personal information without redactions, which the court endorsed by way of formal order on June 16, 2023. Dkt. 13. The government then prepared and delivered an initial set of discovery to defense counsel within

1 the time limits set forth by Eastern District of California Local Rule 440.

2 2. The government produced supplemental discovery subject to the protective order to the

3 defense on July 19, 2023.

4 3. The government produced additional supplemental discovery to the defense on September

5 26, 2023. The defense is and has been reviewing discovery thus far provided.

6 4. The government currently believes all discovery has been produced pursuant to Rule 16. If

7 the government identifies additional information that should be produced as supplemental

8 discovery, the government will promptly produce it in accord with Rule 16.

9 5. Defense counsel needs more time to complete its review of the discovery, conduct any

10 additional investigation, and communicate with both the defendant and government counsel

11 about any potential pretrial resolution of this case.

12 6. Defense counsel believes that failure to grant the above-requested continuance would deny

13 her the reasonable time necessary for effective preparation, taking into account the exercise

14 of due diligence.

15 7. The government does not object to the continuance.

16 8. The parties therefore stipulate that the period of time from October 11, 2023, through and

17 including December 13, 2023, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and

18 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the

19 parties' request on the basis of the Court's finding that the ends of justice served by taking

20 such action outweigh the best interest of the public and the defendant in a speedy trial.

21 IT IS SO STIPULATED.

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23 Dated: September 26, 2023

PHILLIP A. TALBERT
United States Attorney

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25 By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
Assistant United States Attorney

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1 Dated: September 26, 2023

By: /s/ ERIN SNIDER

ERIN SNIDER

Counsel for Defendant

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4 **ORDER**

5 IT IS ORDERED that the status hearing currently set for October 11, 2023, at 1:00 pm is
6 continued until **December 13, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.**

7 IT IS FURTHER ORDERED THAT the period of time from October 11, 2023, through and
8 including December 13, 2023, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i)
9 and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of
10 the Court's finding that the ends of justice served by taking such action outweigh the best interest of the
11 public and the defendant in a speedy trial.

12
13 IT IS SO ORDERED.

14 Dated: September 27, 2023

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE